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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

KATHERINE ROBLES, an individual; and H.R., Case No.: 2:22-cv-00085-KJM-DB
by and through his guardian ad litem Katherine
Robles;

Plaintiffs,

vs.

**STIPULATION TO EXTEND DISCOVERY
AND RELATED DEADLINES; ORDER**

CITY OF ROSEVILLE, a Municipal
Corporation; OFFICER DEAN RIANO, in his
official and personal capacity; OFFICER SETH
ADDINGTON, in his official and personal
capacity; SERGEANT CHRISTOPHER
CLAMPA, in his official and personal capacity;
and DOES 1-20, inclusive, individually, jointly
and severally,

Complaint filed: 01/14/2022

Defendants. /

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1 The parties hereto, by and through their undersigned counsel of record, hereby enter the following
2 stipulation which they respectfully request that the Court enter as an Order in this action:

3 WHEREAS, on January 14, 2022, Plaintiff Katherine Robles, and minor H.R., by and through his
4 guardian ad litem Katherine Robles (collectively “Plaintiffs”), filed a Complaint against the Defendants City
5 of Roseville, Dean Riano, in his official and personal capacity; Seth Addington, in his official and personal
6 capacity; Christopher Ciampa, in his official and personal capacity, (collectively “Defendants”) in the
7 United States District Court for the Eastern District of California, the Sacramento Division.

8 WHEREAS, on June 3, 2022, the Honorable Kimberly J. Mueller ‘s Minutes for the Scheduling
9 Conference held on June 2, 2022 (ECF No. 18), established the following dates and deadlines related to
10 discovery and related dates:

- 11 1. Fact Discovery Completion: March 31, 2023;
- 12 2. Expert Disclosures: May 12, 2023;
- 13 3. Rebuttal Expert Witnesses shall be exchanged by June 9, 2023;
- 14 4. All expert discovery shall be completed by July 7, 2023; and
- 15 5. all dispositive motions, except for motions for continuances, temporary restraining orders or
16 other emergency applications, shall be heard by October 6, 2023.

17 WHEREAS, the parties have met and conferred in good faith regarding scheduling the depositions
18 of at least five additional depositions and further discovery to exchange;

19 WHEREAS, Plaintiffs’ counsel has trial and other scheduled litigation for the next three months and
20 need an extension to conduct the additional necessary discovery;

21 WHEREAS, the parties are discussing and at the present time intend to attend a mediation in this
22 matter in the late-spring or early-summer, after sufficient discovery has been completed so the parties may
23 engage in meaningful settlement discussions.

24 THEREFORE, the Parties hereby stipulate and jointly request that the Court grant an extension for
25 the above listed deadlines as follows:

- 26 1. Fact Discovery Completion: November 30, 2023;
- 27 2. Expert Disclosures: February 12, 2024;

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3. Rebuttal Expert Witnesses shall be exchanged by March 13, 2024;
4. All expert discovery shall be completed by April 2, 2024; and
5. All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be heard by July 6, 2024;

IT IS SO STIPULATED.

Dated: 1/3/2022

ALEMI LAW

By: /s/ Samander Alemi
Samander Alemi
Attorney for Plaintiffs

Dated: 1/3/2022

PORTER SCOTT
A PROFESSIONAL CORPORATION

By: /s/ William E. Camy
William E. Camy
Attorney for Defendants

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ORDER

Having reviewed the foregoing stipulation, and good cause appearing, the Court hereby ORDERS as follows:

1. All previous deadlines for fact discovery completion, expert disclosures, rebuttal expert disclosures, expert discovery completion, and dispositive motions are VACATED.
2. The new deadlines shall be as follows:
 - a. Fact Discovery Completion: November 30, 2023;
 - b. Expert Disclosures: February 12, 2024;
 - c. Rebuttal Expert Witness Disclosures shall be exchanged by March 13, 2024;
 - d. All expert discovery shall be completed by April 2, 2024; and
 - e. All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be heard by July 19, 2024.

IT IS SO ORDERED.

DATED: January 13, 2023.


CHIEF UNITED STATES DISTRICT JUDGE

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